



# Memorandum

To: Honorable Donald L. Cabell, United States Magistrate Judge  
From: Christopher P. Moriarty, Sr. United States Probation Officer  
CC: Sarah E. Walter, AUSA; Jeffrey A. Denner, Counsel for Defendant  
Date: May 11, 2016  
Re: Mark Jones 16-MJ-01005-DLC

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As the Court is aware, Mark Jones has been charged in an Indictment with Wire Fraud, in violation of Title 18, U.S.C. § 1343. The defendant made his Initial Appearance in this District on March 25, 2016, at which time he was released on a \$1,000,000 unsecured bond along with restrictive conditions including the following:

- (7) The defendant must:
- (p) participate in one of the following location restriction programs and comply with its requirements as directed.
  - (i) Curfew. You are restricted to your residence every day from 9:00 PM - 9:00 AM.

The defendant was placed on location monitoring on March 25, 2016. This officer would respectfully request that the defendant's curfew be modified to allow him to leave the residence at 6:30 AM with a return time of 10:00 PM. The defendant has recently secured employment as an Independent Contractor with Garcia & Ortiz Staffing, LLC. The defendant will be writing proposals and helping them with business development. This employment would require the defendant to leave his residence prior to the current 9:00 AM leave time. Additionally, the defendant has requested that he be allowed to attend daily AA meetings at the Emmanuel Church in Boston. As he is now working, the daily meetings are from 8:00 PM – 9:00 PM. As such, we would request the modification to the 10:00 PM return time. The defendant presents no risk of danger to the community, and was ordered subject to a curfew with location monitoring to address risk of flight. As such, it is this officer's opinion that the period of time the defendant is allowed to leave during the day makes little difference, so long as he is returning to the residence each night. This officer has discussed this matter with AUSA Sarah Walters who has indicated she has no objection.

If Your Honor concurs with this recommendation, please affix your signature below. If the Court has any questions or if may be of assistance in any way, please feel free to contact me at 617-908-6700 or at [christopher\\_moriarty@map.uscourts.gov](mailto:christopher_moriarty@map.uscourts.gov).

Reviewed & Approved by:

/s/Alicia Howarth

Alicia Howarth,

Supervising U.S. Probation Officer

☐ Curfew time is modified.

☐ Other: \_\_\_\_\_  
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The Honorable Donald L. Cabell  
United States Magistrate Judge

\_\_\_\_\_  
Date